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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
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MAR 12 2015

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COMPLIANCE AND ENFORCEMENT

Reply to: OCE-127

**Certified Mail Number 7014 1200 0001 4321 0820**  
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J. Wayne Maxie, R.G.  
Manager, Environmental Projects  
Agrium US, Inc.  
4582 S Ulster Street Suite 1700  
Denver, CO 80237-2641

Re: Proposed Modifications to Groundwater Monitoring Program  
Administrative Order on Consent for Nu-West Industries, Inc.  
Idaho Facility, Docket No. RCRA-10-2009-0186

Dear Mr. Maxie:

This letter responds to proposed modifications to the current Groundwater Monitoring Program at the Nu-West Industries facility, as requested by correspondence from your contractor WSP, dated February 13, 2015 and March 9, 2015. We discussed a reduction in the frequency of groundwater sampling at the Nu-West Industries investigation via conference call on March 9. This letter also serves as a follow-up to that conference call.

EPA and Idaho DEQ have had receipt of the 2014 Annual Groundwater Monitoring Report for less than one month, and we have provided some limited feedback and comments to Nu-West prior to submittal of the Updated Site Assessment Report, which is due at the end of this month. We are looking forward to receipt of that report and the opportunity to review it in context with the annual groundwater report data.

In the interim, EPA has indicated some flexibility with respect to the first quarter sampling and monitoring. However, EPA is not prepared to make any decisions on changes to the longer-term groundwater monitoring program until after we have reviewed the Updated Site Assessment Report, discussed the information with Idaho DEQ, and provide comment to Nu-West.

WSP's March 9 email included a "Table 1 Proposed Groundwater Monitoring Program" (WSP Table 1), which identifies proposed frequencies in quarterly sampling at the different groundwater monitoring wells. The table proposes sampling in the first quarter at 29 basalt bedrock monitoring wells, 10 alluvial soil-bedrock monitoring wells, and 1 sedimentary bedrock monitoring well. EPA's March 6, 2015 letter responded to the request to modify the sampling frequency at the alluvial soil-bedrock monitoring wells.

With respect to the basalt bedrock and sedimentary bedrock groundwater monitoring wells, there are areas where EPA requires continued groundwater monitoring in the first quarter that the request from WSP does not contemplate groundwater sampling. I have identified those locations below and explained the rationale.

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EPA has raised concerns regarding a number of monitoring wells where past groundwater sampling has indicated a pH of greater than 8. This is unusual, given the effect that acids and other contaminants of concern have on the pH range of groundwater. Nu-West has suggested that stagnation of the water column within the well bore has been the source of elevated pH and has proposed modifications to sampling techniques so as to ensure that representative formation groundwater is obtained in future sampling events. Until this issue has been resolved for these monitoring wells, the elevated pH data calls into question the validity of that past sampling data. Reliance upon that past data as justification to reduce the frequency of future sampling is not warranted. Continued sampling of the following monitoring wells is required:

A-19-240  
A-32-110  
A-49-185  
A-50-100  
A-50-125  
A-51-185  
A-71-220

During our meeting in Seattle on February 19, your team stated that a bad calibration of a pH meter on June 11, 2014 attributed to elevated field pH readings at several other locations. When identifying problems with data acquisition and analyses, such as instrument calibration errors that affect data output, that information needs to be discussed in the QA/QC sections of the reports being provided to EPA and Idaho DEQ. It is appropriate to also include a footnote or data qualifier symbol to the data sheets containing the suspect data.

Groundwater samples from monitoring well A-33-070 show increasing trends in cadmium and fluoride, both in excess of the Maximum Contaminant Level (MCL). The location places it at the down-gradient southwest corner of the main plant area and within close proximity to neighboring property. Similarly, groundwater samples from monitoring well A-58-105 have shown a consistent increasing trend in fluoride since installation, and samples are also in excess of several other MCLs. Continued sampling of these monitoring wells is required in the first quarter to determine if these trends continue to increase.

In responding to EPA's proposed change in fluoride monitoring (EPA letter dated March 6, 2015), Nu-West proposed to collect and analyze split samples for fluoride by EPA 300, SM4500, and industry ISE method from a subset of 10 monitoring wells listed as follows (4Q14 fluoride data in parenthesis):

A-34-022 (927 mg/l)  
A-43-017 (1,700 mg/l)  
A-49-095 (1.6 mg/l)  
A-53-165 (0.22 mg/l)  
A-63-050 (385 mg/l)  
A-64-052 (116 mg/l)  
A-66-070 (48.3 mg/l)  
A-67-100 (64.4 mg/l)  
A-73-190 (8.5 mg/l)  
A-74-395 (<0.60 mg/l)

EPA agrees and approves of this alternate approach. One of our concerns however, is that potential interferences to fluoride analysis by the EPA method 300 from contaminants other than fluoride could bias sample results lower. EPA requests that two additions be made to the list, at monitoring well locations where fluoride impacts to groundwater are probable and where past sampling and analyses have indicated low fluoride content. These two locations are as follows (4Q14 fluoride data in parenthesis):

A-29-145 (<0.60 mg/l)

A-28-110 (<1.50 mg/l)

Continued quarterly monitoring, including analyses for gross alpha activity, is required at the A-19-240 and A-32-110 monitoring wells. EPA's March 6 letter required additional gamma spectroscopy analyses. As discussed on our March 9 conference call, we are deferring a decision on that until after we have had an opportunity to review future data from the A-19-240 and A-32-110 monitoring wells.

The request for a reduction in sampling frequency (WSP Table 1) for those basalt bedrock and sedimentary bedrock monitoring wells not identified above, is approved for the first quarter only.

A revision to the Groundwater Monitoring Plan is not necessary at this time.

Thank you for your attention to this important matter.

Sincerely,



Peter Magolske  
Air and RCRA Compliance Unit

cc: Brian Monson, Idaho Department of Environmental Quality  
P. Scott Burton, Esq. Hunton and Williams LLP  
Timothy J. Carlstedt, Esq. Hunton and Williams LLP

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